UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BHUTAN INTERNATIONAL FESTIVAL, LIMITED; BHUTAN DRAGON EVENTS AND FESTIVALS, LIMITED,

Plaintiffs,

VS.

EDEN PROJECT; EDEN PROJECT LIMITED; EDEN LAB; AND EDENLAB LTD.,

Defendants.

1:17-cv-08980-VEC

DEFENDANT EDEN PROJECT LIMITED'S RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendant Eden Project Limited¹, a private company limited by shares organized under the laws of the United Kingdom and located in Bodelva, England, certifies that it is a wholly-owned subsidiary of a charitable organization, The Eden Trust, and that no publicly held corporation owns ten percent (10%) or more of its stock.

New York, New York February 6, 2018

SEWARD & KISSEL LLP

By: /s/ Mark J. Hyland Mark J. Hyland Tamara Rozina

One Battery Park Plaza New York, NY 10004 (212) 574-1200

Attorneys for Defendants Eden Project and Eden Project Limited

¹ We are not aware of an entity named "Eden Project," as named in the Complaint and therefore cannot attest to its structure or ownership.

CERTIFICATION OF SERVICE

I hereby certify that on February 6, 2018, a copy of the foregoing Rule 7.1 Disclosure Statement was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filings as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Mark J. Hyland